

Message

From: Kenknight, Jeff [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=803CDA0C34F14C298367A1C90825EF16-KENKNIGHT, JEFF]
Sent: 8/1/2019 6:03:42 PM
To: Contreras, Peter [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=3c7e515833814b74a7ebafcfef8b6322-Contreras, Peter]
Subject: FW: Possibly we'll want Jeff on the line too

I had a VM from Mark earlier this morning about what we can and can't say about compliance with orders for WS. Can you run that ground if you haven't already. Thanks

From: Contreras, Peter <Contreras.Peter@epa.gov>
Sent: Thursday, August 01, 2019 10:56 AM
To: Kenknight, Jeff <Kenknight.Jeff@epa.gov>
Subject: FW: Possibly we'll want Jeff on the line too

Jeff: Mark & Adam will talk to the reporter at 1:30 pm w/Matt Martinson. I told Adam I didn't think you'd need to participate.

Thanks,

Peter



Peter Contreras, Chief
Field, Data & Drinking Water Enforcement Section
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Seattle, WA (206) 553-6708

From: Baron, Adam <Baron.Adam@epa.gov>
Sent: Thursday, August 01, 2019 10:43 AM
To: Contreras, Peter <Contreras.Peter@epa.gov>
Subject: Possibly we'll want Jeff on the line too



Adam Baron
Drinking Water Enforcement Officer
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From: Baron, Adam
Sent: Thursday, August 01, 2019 10:41 AM
To: Contreras, Peter <Contreras.Peter@epa.gov>
Subject: RE: R10 looking for an example of a NOV for violation of open SDWA Order

Call me when you get a window in re: warm springs call with OPB reporter today.



Adam Baron
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From: Contreras, Peter <Contreras.Peter@epa.gov>
Sent: Thursday, August 01, 2019 10:37 AM
To: Baron, Adam <Baron.Adam@epa.gov>; Thurmon, Clarke <Thurmon.Clarke@epa.gov>
Subject: RE: R10 looking for an example of a NOV for violation of open SDWA Order

Thanks, Adam. I wouldn't spend more time beating the bushes than you already have. I like your idea of just drafting a letter that says what we want to communicate. I'd suggest something along these lines...

Notice of Violation

- Section XX of the order requires BIA to [replace the pipe] by XX/XXXX.
- We received your request for extension, dated ... (& previous communications)
- You have not provide sufficient rationale to support an extension request
- Therefore, you are in violation of the order. Per Section XX of the Order, failure to comply may subject BIA to penalties of ...
- Please submit a written justification for your extension request including
 - o [provide level of detail we would determine to be a sufficient request]

Signed by Ed?

Happy to discuss, or hear alternate thoughts.

Thanks,

Peter



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From: Baron, Adam <Baron.Adam@epa.gov>
Sent: Thursday, August 01, 2019 9:42 AM
To: Thurmon, Clarke <Thurmon.Clarke@epa.gov>
Cc: Contreras, Peter <Contreras.Peter@epa.gov>
Subject: RE: R10 looking for an example of a NOV for violation of open SDWA Order

Hmmm....Peter clearly wants something out by next week at the latest. BIA is supposed to provide me something this week which I was going to incorporate into the NOV. But we need a template at least partially drafted before that comes in. I'll email Carol and Morgan now, maybe even FFEO attorney, to see if they can kick start. Otherwise I'll put first draft together and have you start editing before you go....maybe give Leah heads up if we can't get concurrence before you leave.

Stand by.



Adam Baron

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From: Thurmon, Clarke <Thurmon.Clarke@epa.gov>
Sent: Wednesday, July 31, 2019 6:02 PM
To: Baron, Adam <Baron.Adam@epa.gov>
Cc: Contreras, Peter <Contreras.Peter@epa.gov>
Subject: RE: R10 looking for an example of a NOV for violation of open SDWA Order

Adam,

Hi.

You might reach out to Carol King to see if she has any templates from which to start.

I am in the office tomorrow, working from home Friday (early until the early afternoon), Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) Let me know if you want me to get involved; Ex. 6 Personal Privacy (PP)

Thanks,
Clarke

Clarke Thurmon

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From: Baron, Adam
Sent: Wednesday, July 31, 2019 4:49 PM
To: Thurmon, Clarke <Thurmon.Clarke@epa.gov>
Cc: Contreras, Peter <Contreras.Peter@epa.gov>
Subject: FW: R10 looking for an example of a NOV for violation of open SDWA Order

No response on this from our esteemed colleagues. Any other analogue you can think of before I start drafting from scratch? Not that complicated, but still if there were already a approved model. We could also ask FFEO folks for Carol King.



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From: Baron, Adam
Sent: Tuesday, July 30, 2019 4:24 PM
To: Kraft, Nicole <Kraft.Nicole@epa.gov>; Driskell, Amanda <Driskell.Amanda@epa.gov>; Wittenberg, Olive <Wittenberg.Olive@epa.gov>; Moore, Jessica <Moore.Jessica@epa.gov>; Pringle, Everett <Pringle.Everett@epa.gov>
Cc: Thurmon, Clarke <Thurmon.Clarke@epa.gov>
Subject: R10 looking for an example of a NOV for violation of open SDWA Order

Fellow regional SDWA practitioners –

We've got a federal facility respondent in violation of an open SDWA 1431. Our director wants to do a line-in-the-sand NOV clearly stating they are in violation of the 1431 before potentially elevating/ issuing a penalty action. Anyone have some like that for an open 1431 or 1414?

Many thanks.

Adam Baron
Drinking Water Enforcement Officer



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